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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA GAS)
OF KENTUCKY, INC. FOR AUTHORITY)
TO ALLOCATE THE PROCEEDS OF ITS)
STRANDED COST/RECOVERY POOL)

Case No. 2005-00446

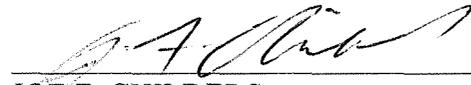
**MOTION FOR FULL INTERVENTION BY
COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE,
BOURBON, HARRISON AND NICHOLAS COUNTIES**

Comes now the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, pursuant to 807 KAR 5:001 Section 3(8), and hereby moves for leave to intervene as a full party in the above-referenced proceeding. In support of this motion, CAC states as follows:

1. CAC is a non-profit, 501(c)(3), community action agency which provides social services, including energy assistance and related services, to numerous low income residents of the service territory of Columbia Gas of Kentucky, Inc. ("Columbia"). As such, it is likely to present issues and provide a perspective which is not likely to be presented by the other parties to this proceeding, and its interests are not adequately represented by other parties to this proceeding. CAC's participation will not unduly delay these proceedings.
2. In this proceeding, the Commission will examine the request by Columbia to allocate one-half of the funds remaining in the Stranded Cost/Recovery Pool,

approximately \$3.6 million, to customers and to retain the other half of the remaining funds. As an alternative, Columbia has proposed that 10% of the Stranded Cost/Recovery Pool balance be transferred to CAC for additional weatherization funds to benefit CAC's low-income clients. The latter alternative will be advocated in this proceeding by CAC.

3. CAC expects to present testimony from Jack E. Burch, Executive Director. CAC may choose to present testimony from other witnesses not yet identified.
4. The intervention of CAC into this action is likely to present issues and facts that will not be adequately addressed or represented by any other party and will be helpful to the Commission in fully considering the matters without unduly complicating or disrupting this proceeding.
5. CAC respectfully requests that it be granted leave for full intervention and to participate fully as a party in this proceeding, including the right to present testimony and exhibits, present witnesses, cross examine witnesses, present argument and file briefs as allowed by the Commission.



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**ATTORNEY FOR COUNCIL FOR
LEXINGTON-FAYETTE, BOURBON,
HARRISON AND NICHOLAS
COUNTIES, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document has been served on the following persons on this the 23rd day of November, 2005.

Stephen B. Seiple, Esq.
Columbia Gas of Kentucky, Inc.
P.O. Box 117
Columbus, OH 43216-0117



JOE F. CHILDERS